1 2 3 4 5 6 7	WRIGHT, FINLAY & ZAK, LLP Darren T. Brenner, Esq. Nevada Bar No. 8386 Jory C. Garabedian, Esq. Nevada Bar No. 10352 7785 W. Sahara Ave., Ste. 200 Las Vegas, NV 89117 (702) 475-7964; Fax: (702) 946-1345 jgarabedian@wrightlegal.net Attorney for Defendant, Bank of America, N.A. UNITED STATES	DISTRIC COURT
8	DISTRICT OF NEVADA	
9 10	TYLER K. JONES, an individual	Case No. 2:22-cv-02049-JCM-NJK
11	Plaintiff,	
12	v.	UNOPPOSED MOTION TO EXTEND
13	BANK OF AMERICA, N.A., a national	TIME TO RESPOND TO PLAINTIFF'S COMPLAINT
14	banking association; EQUIFAX	
15	INFORMATION SERVICES, LLC, a foreign limited-liability company; EXPERIAN	(First Request)
16	INFORMATION SOLUTIONS, INC., a foreign corporation; TRANS UNION LLC, a	
17	foreign limited-liability company;	
18	Defendants.	
19		
20	Defendant Bank of America N.A. ("BANA") by and through its undersigned counsel of	
21	record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's	
22	Complaint (First Request):	
23	On December 9, 2022, Plaintiff filed his Complaint [ECF No. 1]. The Summons and	
24	Complaint were purportedly served on BANA on December 15, 2022, which makes the initial	
25	deadline to respond to the Complaint January 5, 2023.	
26	BANA's counsel is still investigating the allegations raised in Plaintiff's Complaint	
27	Further, Plaintiff and BANA have discussed extending the deadline 30-days to February 6, 2023	
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1 in order to explore early resolution opportunities. On January 4, 2023, BANA received approval 2 of the 30-day extension request from Plaintiff's counsel. 3 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline 4 for BANA to file its response to Plaintiff's Complaint to February 6, 2023. This is the first request 5 for extension of time for BANA to respond to Plaintiff's Complaint. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party. 6 7 Dated this 4th day of January, 2023. 8 WRIGHT, FINLAY & ZAK, LLP 9 10 /s/ Jory C. Garabedian 11 Darren T. Brenner, Esq. Nevada Bar No. 8386 12 Jory C. Garabedian, Esq. Nevada Bar No. 10352 13 7785 W. Sahara Ave., Suite 200 14 Las Vegas, Nevada 89117 Attorneys for Bank of America, N.A. 15 16 17 IT IS SO ORDERED: 18 19 20 UNITED STATES MAGISTRATE JUDGE 21 DATED: January 5, 2023 22 23 24 25 26 27 28